

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.
20-cv-04651-SDG

AFFIDAVIT OF KOMAL PATEL

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, KOMAL PATEL, who being duly sworn, deposed and stated as follows:

1. My name is KOMAL PATEL. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in DeKalb County, Georgia.

3. On November 16, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Clayton County, Georgia (the “Recount”).

4. I arrived at the Clayton County Police Department, where the Recount was held while I observed it, shortly after 8 a.m.

5. On arrival at the Police Department, I had no problems accessing the room where the Recount was happening.

6. The space was small. But at no point was I concerned about the ability to view what was happening in any part of the room. While waiting in the roped off area (for the public, media, and party volunteers who took turns observing the floor where people were counting), it was easy to see what was happening all around the room. Any observer could easily see what was happening in any part of the room merely by moving around a few steps.

7. While monitoring the counting floor – which involved actually walking around next to the tables with people who were counting – I had access to view each of the two-person audit teams at the tables. I could hear the auditors announce and discuss the votes they counted on each ballot. I could also see the selections voters had made on the ballots that the audit teams were recounting, and

could see into what designated stack a given audit team placed each ballot. Other credentialed observers had the same access as I did.

8. While I was present, I observed at least five individuals who I understand were associated with the Trump Campaign and/or Republican Party. I observed one of these individuals taking pictures and sending them to somebody on his phone. I observed a Trump-Pence logo on those messages.

9. Additionally, I observed at least three of these individuals causing disruptions in the Recount room. For example, one of the individuals began complaining to an election official that the County was not following the rules by permitting only one monitor per party even though there were 12 tables in the room. I understand this is the subject of the Affidavit submitted by Ibrahim Reyes. The individuals I observed were being highly combative and were disruptive. This resulted in an election official ultimately asking a couple of the individuals to temporarily leave the Recount room.

10. While I was observing the Recount, in addition to the 5 Republican observers, there were approximately 6 other credentialed observers present, with about 4 representing the Democratic Party, and 2 from the Carter Center (additional non-credentialed observers remained in the public viewing area).

11. Each party, both Republican and Democratic, as well as the Carter Center, had monitors present and on the floor of the Recount throughout the time I was present. The monitors for each party, and the Carter Center, alternated on the floor. The same rules were applied to all credentialed observers.

12. I also observed a group of individuals I understood to be the members of a vote review panel. I saw at least two of the individuals affiliated with the Republican Party serve on this panel.

13. I also saw two or three members of the news media and other members of the public observing the Recount from a designated area.

14. I observed no inaccuracies, improprieties, inconsistencies, or other problems during the Recount. The audit teams I observed appeared to be counting correctly. The process ran smoothly, minus the above-mentioned disruptions.

15. Around noon, after approximately 3 hours of observation, I left the Recount because the County took a break for lunch.

16. I learned from a notice posted by the County in the room where the morning Recount took place that the Recount was being moved to the Jackson Elementary School gymnasium in the afternoon of November 16, 2020 (beginning at 1:30 p.m.). I did not attend the afternoon session of the Recount on November 16, 2020.

17. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

18. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 18th day of November 2020.

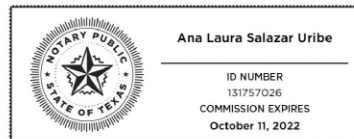
Komal Patel (signed)

KOMAL PATEL

Sworn to and subscribed to
before me this 18th day of
November 2020.

Ana Salazar Uribe

Notary Public



My commission expires: 10/11/2022

Notarized online using audio-video communication